

THE ROSEN LAW FIRM, P.A.

Phillip Kim, Esq. (PK 9384)

pkim@rosenlegal.com

Laurence M. Rosen, Esq. (LR 5733)

lrosen@rosenlegal.com

350 Fifth Avenue, Suite 5508

New York, NY 10118

Telephone: (212) 686-1060

Fax: (212) 202-3827

Lead Counsel for Plaintiffs and Class

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARLOS MUÑOZ, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,)	No.: 07-CV-10531 (AKH)
Plaintiff,)	DECLARATION OF PHILLIP KIM IN
vs.)	SUPPORT OF LEAD PLAINTIFFS'
)	MOTION FOR ORDER DECLARING
)	THE PSLRA DISCOVERY STAY IS NO
)	LONGER IN EFFECT
CHINA EXPERT TECHNOLOGY, INC.,)	BY ECF FILING
Defendant.)	
)	
)	

**DECLARATION OF PHILLIP KIM IN SUPPORT OF LEAD PLAINTIFFS' MOTION
FOR ORDER DECLARING THE PSLRA DISCOVERY STAY IS NO LONGER IN
EFFECT**

Phillip Kim, hereby declares;

1. I am an attorney of The Rosen Law Firm P.A., Lead Counsel for the Class in this action and have personal knowledge of the facts set forth herein. I make this declaration in support of the motion of Lead Plaintiffs, CXTI Investors, for an order declaring the PSLRA discovery stay is no longer in effect. I am duly admitted to practice before this Court on this matter.

2. A complaint was filed on November 21, 2007. See Docket # 1.
3. Defendant China Expert Technology, Inc. is a Nevada corporation.
4. The complaint was served upon Defendant China Expert Technology, Inc.

by a licensed process server in Nevada on November 30, 2007.

5. China Expert Technology, Inc. accepted service. See Docket # 2.
6. The Summons was returned executed, and it was filed on December 7, 2007.

See Docket # 2.

7. The answer was due on December 20, 2007. See Docket #2.
8. Defendant never filed an answer. Defendant never filed a motion to dismiss.
9. Notice of the Clerk's Certificate of Default as to China Expert Technology, Inc. was filed on January 22, 2008. See Docket # 3.

10. Notice of Voluntary Dismissal, without Prejudice, as to Defendants Zhu Xiaoxin, Huang Tao, and Fu Wan Chung, a/k/a Simon Fu was filed on March 17, 2008. See Docket # 17.

11. The Order appointing CXTI Investors Lead Plaintiff and The Rosen Law Firm, P.A. Lead Counsel was filed on March 25, 2008. See Docket # 18.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on March 31, 2008, at New York, New York.

/s/ Phillip Kim
Phillip Kim, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2008, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Notice was provided via First Class Mail to:

China Expert Technology, Inc.,
C/O Registered Agent
Incorp Services, Inc.
3155 East Patrick Lane, Suite 1
Las Vegas, NV 89120-3481

/s/ Phillip Kim